



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region IX
75 Hawthorne St
San Francisco, CA 94105

ENFORCEMENT AND COMPLIANCE
ASSURANCE DIVISION

AUGUST 25, 2020

SENT VIA ELECTRONIC MAIL
RETURN RECEIPT REQUESTED

IN THE MATTER OF:

**Dykstra Machinery, LLC
Jamie Dykstra, Member
3026 North Rockwell Avenue
Casa Grande, AZ 85122
jamie@dykstramachinery.com**

**Dykstra Management Company Inc.
Kimberly Dykstra, Director
Jamie Dykstra, Director
3026 North Rockwell Avenue
Casa Grande, AZ 85122
kim@dykstramachinery.com
jamie@dykstramachinery.com**

**Dykstra Inc.
Jamie Dykstra, Director and President
2585 E. Queen Creek Road
Gilbert, AZ 85297
jamie@dykstramachinery.com**

**ATTENTION: Jamie Dykstra, Member and Statutory Agent, Dykstra Machinery, LLC
Kimberly Dykstra, Director and Statutory Agent, Dykstra Management
Company Inc.
Jamie Dykstra, Director, Dykstra Management Company Inc.
Jamie Dykstra, Director, President, and Statutory Agent, Dykstra Inc.**

Request for Information Under § 208(a) of the Clean Air Act, 42 U.S.C. § 7542(a)

The United States Environmental Protection Agency ("EPA") hereby requires Dykstra Machinery, LLC; Dykstra Management Company Inc.; and Dykstra Inc. ("Dykstra" or collectively, "you") to submit certain information as part of an EPA investigation to determine

Dykstra's compliance with Section 203 of the Clean Air Act ("CAA"), 42 U.S.C. § 7522, and the applicable regulations at 40 C.F.R. Parts 85, 86, 1039, and 1068. Examples of vehicles regulated under these Parts include, but are not limited to, diesel trucks and light-duty gasoline vehicles, and nonroad equipment.

You own and operate businesses in or near Casa Grande, Arizona, and Gilbert, Arizona, which involve use of heavy-duty diesel and nonroad vehicles, engines, and/or equipment. We are requesting this information to determine whether parts, components, vehicles, engines, or other equipment sold, installed, owned, or operated by you are complying with Section 203 of the CAA and the regulations promulgated under Subchapter II of the CAA at 42 U.S.C. §§ 7521-7590.

Appendix A provides definitions, Appendix B provides instructions for your responses to this request, including instructions for electronic submissions, and Appendix C specifies the information that you must submit. Appendix D provides information about asserting a claim of confidentiality over information you provide in response to this Information Request. Appendix E contains the form with which you are required to certify the truth and completeness of your response. Appendix F is an Excel workbook provided by EPA to organize your responses to Request 3.

The EPA issues this Request for Information ("Information Request") under Section 208(a) of the CAA, 42 U.S.C. § 7542(a). Under Section 208(a), the Administrator of the EPA may require any person who is subject to the CAA to provide information necessary to determine whether the person has acted in compliance with these requirements and the regulations promulgated thereunder. The Administrator has delegated this authority to the undersigned Manager of Region 9's Air Enforcement Office, Enforcement and Compliance Assurance Division.

At this time, EPA Region 9 is not accepting any hard-copy document deliveries. If possible, we ask you to provide you respond in electronic form via email at chan.janice@epa.gov or a file transfer program (FTP). Upon request to chan.janice@epa.gov, EPA can provide a secure link to an FTP site in order to submit responses to this Information Request.

You must submit responses to this Information Request to the EPA representative listed below within thirty (30) calendar days from the date you receive this letter. Please carefully review the instructions, definitions, and specific requests as you prepare your response. If you anticipate being unable to fully respond to the Information Request by this date, you must contact Roshni Brahmbhatt at (415) 972-3995 or Brahmbhatt.Roshni@epa.gov to request an extension. Any such request should be made as soon as possible after receipt of this Information Request and must include an explanation of why an extension is necessary and include a proposed timeline for providing the requested information. The EPA will review your request and may extend the time in which your response must be provided to some or all of the questions.

Failure to provide the requested information may result in the initiation of a civil action

pursuant to Section 205(b) of the CAA, 42 U.S.C. § 7524(b). Failure to provide all requested information in its entirety, and in the format requested, may result in additional inquiries and penalties. Pursuant to Sections 208 and 307 of the CAA, 42 U.S.C. §§ 7542(a)–(b), 7607(a), EPA may request additional information, inspections, or depositions. It is important that your responses be clear, accurate, organized, and complete. We will regard any information that is misleading, false, incomplete, or submitted without regard to its accuracy as a violation of the CAA and/or criminal statutes. We may use any information submitted in response to this Information Request in an administrative, civil, or criminal action.

EPA acknowledges that the COVID-19 pandemic may be impacting your business. If that is the case, we will consider your specific circumstances in determining an appropriate timeline for responding to this request for information, while still ensuring that the Agency receives the information it needs to timely confirm your company's compliance with the CAA.

You must submit all requested information under an authorized signature with the following certification (provided in Appendix E):

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act, 42 U.S.C. § 7413(c)(2), and 18 U.S.C. §§ 1001 and 1341.

You may be entitled to assert a business confidentiality claim covering all or part of the information provided in response to this Information Request as specified in the Confidentiality of Business Information (“CBI”) regulations, 40 C.F.R. Part 2, Subpart B. You must specify the page, paragraph, and sentence when identifying the information subject to your CBI claim. Appendix D of this Information Request specifies the assertion and substantiation requirements for business confidentiality claims. EPA may, without further notice, provide the public with any information not subject to a CBI claim.

Any questions concerning this Information Request should be directed to Janice Chan at (415) 972-3308 or Chan.Janice@epa.gov or have your attorney contact Brian Riedel in the Office of Regional Counsel at (415) 972-3924 or Riedel.Brian@epa.gov.

Roshni Brahmbhatt, Manager
Air Enforcement Office
Enforcement and Compliance Assurance
Division
EPA Region 9 – San Francisco

Appendix A

Definitions

All terms used in this Information Request will have their ordinary meaning unless such terms are defined below or in the CAA, 42 U.S.C. §§ 7401 et seq., or the Motor Vehicle Regulations found at 40 C.F.R. Parts 85, 86, 1039, and 1068, in which case they shall have their meanings as defined therein.

1. The term “person” includes an individual, corporation, partnership, or association. *See* Section 302(e) of the CAA, 42 U.S.C. § 7602(e).
2. The term “you,” “your,” and “Dykstra” mean Dykstra Machinery, LLC, Dykstra Management Company Inc., Dykstra Inc., and any affiliates, predecessors, successors, and assignees.
3. The term “catalyst” refers to a system, such as a catalytic converter or diesel oxidation catalyst (DOC), that contains parts or chemical elements which increase the rate of a chemical reaction but are not one of the original reactants or final products, *i.e.*, are not consumed or altered in the reaction. Catalysts consist of a flow-through structure that is coated with an active metal catalyst and surrounded by a stainless steel housing.
4. The term “diesel particulate filter” or “DPF,” also known as a “periodic trap oxidizer” or “PTOX,” refers to an exhaust after-treatment emission control component that physically traps particulate matter (PM) and removes it from the exhaust stream, typically using a porous ceramic or cordierite substrate or metallic filter.
5. The terms “derate” or “limp-home mode” mean an ECM mode that reduces the engine power after the On-Board Diagnostics system identifies a problem with an emission control component.
6. The term “exhaust gas recirculation” or “EGR” and “clean gas induction” or “CGI” refers to emission control components that direct a portion of engine exhaust back into the engine’s combustion chamber to control combustion temperatures and pressures, thereby reducing the production of nitrogen oxides (NO_x). The EGR and CGI systems may include a cooler, which cools the recirculated exhaust.
7. The term “emission related parts” means those parts installed for the specific purpose of controlling emissions, or those components, systems, or elements of design which must function properly to assure continued vehicle emission compliance, as defined in 40 C.F.R. § 85.2102.
8. The term “emission control component” means any part or component and its associated fluids, sensors, signals, components, and control systems that function primarily for emission control and whose deviation from original manufacturer specifications and/or

failure may significantly increase emissions.

9. The term “electronic control module” or “ECM” means a device that receives inputs from various sensors and outputs signals to control engine, vehicle, or equipment functions.
10. The term “element of design” means any control system (*e.g.*, computer software, electronic control system, emission control system, computer logic), and/or control system calibrations, and/or the results of systems interaction, and/or hardware items on a motor vehicle, motor vehicle engine, nonroad equipment, or nonroad engines.
11. The term “engine management product” or “EM product” means any device or product capable of accessing, altering, or replacing the software programming, calculations, computer logic, tables of information (*e.g.*, fuel timing maps), coding, or other content or information stored within or used by an ECM. EM products include, but are not limited to, programmers, modules, tuners, ECM calibration tools, replacement ECMs, flash tools, or engine management products.
12. The term “engine tune,” “tune,” or “calibration” means any combination of software programming, calculations, computer logic, tables of information (*e.g.*, fuel timing maps), coding, or other content or information, stored in any form, capable of affecting or controlling an ECM.
13. The term “exhaust product” means exhaust components designed for use downstream from the exhaust port of a motor vehicle engine, and include, but are not limited to, EGR block plates, EGR delete kits, exhaust replacement pipes, and straight pipes. This term does not include ancillary exhaust components such as clamps, hangers, nuts, bolts, and gaskets that are not capable of impacting or replacing emission related parts.
14. The term “On-Board Diagnostics” or “OBD” refers to an ECM that monitors emission control and emission-related components and systems along with certain engine components, such as the fuel delivery system and the engine control module. When the OBD detects a malfunction or deterioration that could affect emissions, it illuminates a malfunction indicator light (MIL) and produces diagnostic trouble codes (DTC) to aid in repair.
15. The term “part or component” includes any part or component intended for use with, or as part of, a motor vehicle, motor vehicle engine, nonroad equipment, or nonroad engine (*e.g.*, ECM, element of design, calibration map, tune, tuner, or software that is installed on or designed for use in such vehicles, equipment, or engines).
16. The term “product” or “products” shall mean any service, part or component, or other item(s), including, but not limited to, engine parts, manifolds, turbos, block plates, straight pipes, power packages, computer tuning, calibrations, elements of design, EM product, tunes, software code, software, hardware, part, component or devices, that are manufactured (*i.e.*, created, written, programmed, fabricated, produced, assembled or

modified), purchased, imported, distributed, downloaded, offered for sale, sold, provided, performed, and/or installed by your company that are intended for use with, or as part of, a motor vehicle, motor vehicle engine, nonroad equipment, or nonroad engine.

17. The term “selective catalytic reduction” or “SCR” refers to an emission control component that includes systems, such as the diesel exhaust fluid (DEF) tank, urea quality sensor, DEF injection system, SCR catalyst(s), and other associated sensors, which inject a reductant, such as DEF, into the exhaust stream where it reacts with catalysts to convert NO_x emissions to nitrogen gas (N₂) and water (H₂O).
18. The term “service” means any action to change, affect, modify, bypass, render inoperative, remove, download, and/or install one or more part(s) or component(s) (e.g. emission control components) or other item(s), including, but not limited to, engine parts, block plates, straight pipes, power packages, computer tuning, calibrations, elements of design, tuners, tunes, software, code, or devices.

Appendix B

Instructions for Responses

1. Please provide your response to this Information Request in electronic form via email or file transfer.
2. Provide copies of documents, not original documents.
3. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for “image over text” to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
4. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.
5. Provide a table of contents of all electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number.
6. Where documents or information necessary for a response is not in your possession, custody, or control, indicate in your response why such documents or information are not available or in your possession, custody, or control, and identify any source that either possesses or is likely to possess such information.
7. Where you have previously submitted information to the EPA that is responsive to any of the Requests set forth in Appendix C, re-submit that information in accordance with these instructions (Appendix B). Identify the material that was previously provided, the date on which it was provided, how the information was provided (e.g., electronically, fax, mail), and the individual at the EPA to whom it was provided.
8. If you assert any objections in responding to this Information Request, each objection must state with specificity the grounds for objecting to the request, including the reasons, and must state whether any responsive materials are being withheld on the basis of that objection.
9. This Request for Information is a continuing request. You must promptly supplement your response to any Request in Appendix C in the event you learn that you possess responsive information not yet produced or if you gain possession, custody, or control of responsive information after responding to this Information Request.

Appendix C

Information Request

Dykstra Machinery, LLC, Dykstra Management Company Inc., and Dykstra Inc. (“Dykstra” or collectively, “you”) must submit the following information to the United States Environmental Protection Agency pursuant to Section 208 of the CAA, 42 U.S.C. § 7542, regarding the installation or sale of parts and products at any location owned, leased, and/or operated by Dykstra for the time period from **January 1, 2017 to the date of this request**.

1. Respond **YES or NO**: Since January 1, 2017, have you manufactured, offered for sale, sold, and/or installed any part, component, or product (such as an EGR block plate, straight exhaust pipe, tune, tuner, ECM re-calibration, or other product, see Appendix A, Definitions, Paragraph #16) which:
 - (a) Bypasses, defeats, or renders inoperative any emission control component, element of design, or emission related part or component including, but not limited to, the DPF system, EGR or CGI system, catalyst system, OBD, SCR, or sensors, signals, or records related to such systems;
 - (b) Simulates the operation of any emission control component and/or related parts including, but not limited to, the DPF system, EGR or CGI system, catalyst, OBD, SCR, or sensors, signals, or records related to these systems; and/or
 - (c) Modifies engine operating parameters, such as fuel injection timing, fuel rail pressure, and/or pulse width, emission control parameters, or OBD functions including, but not limited to, those parameters sensed or controlled by the ECM.
2. For all products identified in response to Request 1, above, provide copies of all purchase receipts/invoices, work orders, sales receipts/invoices and any other documents involving the purchase, sale, and/or installation of each product.
3. In an electronic, unlocked spreadsheet (or you may use the attached Appendix F¹, Worksheet 1), list each product identified in response to Request 1, above, and provide the following information:
 - (a) The product name;
 - (b) The product number;
 - (c) The product manufacturer’s name and address;

¹ Appendix F, which consists of an Excel workbook, is provided electronically for your convenience to assist you in organizing your responses to this Request. Please use the Appendix F format if you are able. If you are not able to use Appendix F, then you should create your own table summarizing the requested information

- (d) The product supplier's name and address (if different than manufacturer's);
 - (e) A description of what the product does and how the product operates (e.g., straight pipe that allows for removal of the DPF and SCR or a tuner that alters fuel injection timing and rail pressure);
 - (f) The type of vehicle(s), equipment, and engine(s) for which the product is designed, used, or sold; including the make(s), model(s), model year(s), engine type(s), year(s), and expected use(s) (i.e. agriculture, construction equipment, on-road diesel, etc.);
 - (g) The average cost to you of the product sold;
 - (h) Your average sale price for the product;
 - (i) The quantity of product that you manufactured each calendar year (or partial year if full year not yet available);
 - (j) The quantity of product that you purchased each calendar year (or partial year if full year not yet available);
 - (k) The quantity of product that you sold each calendar year (or partial year if full year not yet available);
 - (l) The quantity of product that you installed each calendar year (or partial year if full year not yet available); and
 - (m) Indication of whether the product has been emissions tested and/or certified.
4. For products identified in response to Request 1, provide the following:
- (a) A list of media through which you advertised (i.e. website, social media, newspaper, verbal, trucking shows, conventions etc.), specifying the name of the media and/or date of truck show or convention;
 - (b) A list of the Universal Resource Locators (URLs) for any website or social media page that you use or have used to advertise any of the products and/or facilitate sales;
 - (c) Copies of any advertisements to sell, distribute, or install each product, including advertisements on websites and in other media; and
 - (d) Copies of any installation or operation instructions, guides, or manuals for each product.

5. Provide copies of all communications and/or other documents (including emails) between you and the manufacturer or supplier of each product, and between you and the customer for each product, identified in response to Request 1, above.
6. For each product identified in response to Request 1 above, provide copies of any disclaimers, waivers, notices or releases of liability, assumption of risk and/or indemnity agreements, etc. signed by you, your customers, and/or any manufacturers. Provide any documents which relate to knowledge, liability and/or risk associated with the removal and/or modification of emission control components and/or engine parameters.
7. For all products identified in response to Request 1 above, provide copies of all documents related to the purchase, sale, and/or installation of each product that contains any customer vehicle, equipment, and/or engine information and/or information related to the customer's use or intended use of the product.

For vehicles/engines owned, operated, and/or leased by you (at any location):

8. Provide an **unlocked, electronic Excel-compatible spreadsheet** that lists each heavy-duty diesel vehicle (*i.e.*, those vehicles with a gross vehicle weight rating greater than 8,500 pounds) and piece of nonroad equipment owned, operated, and/or leased by you (at any location). For each vehicle and piece of nonroad equipment, provide the following:
 - (a) Any vehicle or equipment identification designation used by you;
 - (b) The vehicle identification number (VIN) or equipment equivalent;
 - (c) Engine make, model, year, size, and horsepower;
 - (d) Chassis or equipment make, model, and year;
 - (e) the emission controls (e.g. DPF, EGR, CGI, SCR, catalyst, including urea injection system) installed on the vehicle or piece of equipment when manufactured; and
 - (f) The owner and operator of each vehicle or piece of equipment.
9. Answer the following questions with a "yes" or a "no" followed by a brief explanation:
 - (a) Do you offer maintenance services to vehicles, equipment, and/or engines outside of any of your fleet(s)?
 - (b) Are any of your fleet vehicles or nonroad equipment ever serviced outside of your facilities? If yes, where are they serviced outside of your facilities?
10. For each vehicle or piece of nonroad equipment listed in response to Request 8, identify, within the same spreadsheet provided in response to Request 8, those vehicles or pieces of nonroad equipment operating (either currently or previously) with one or more modified emission control components and/or with one or more tunes and/or tuners used or installed. Modifications include, but are not limited to, the alteration of the performance or operation, blocking, bypassing, defeating, disconnecting, deleting, deactivating, removal (in part or in whole), or rendering inoperative in any way of any emission control component, element of design, and/or emission related part of the

vehicle or nonroad equipment, including, but not limited to the following systems: the DPF; EGR; CGI; SCR; catalyst (including urea injection system); OBD; and/or any fluid, sensor, signal, component, and/or control system related to these systems.

11. In the same spreadsheet provided in response to Request 8, provide the following information for each vehicle or piece of nonroad equipment identified in response to Request 10, above:
 - (a) List of any and all modifications to the vehicle, equipment, or engine's emissions control components, elements of design, and/or emissions related part, including the following information for each modification:
 - i. The date the modification was completed;
 - ii. Each part or component used to complete the modification, including the part or component's manufacturer, make, and model;
 - iii. The emissions control components that are affected (e.g. DPF, SCR, EGR, CGI, etc); and,
 - iv. All parties involved in providing or completing the modification(s).
 - (b) List of any and all tunes and/or tuners used or installed on the vehicle, equipment, or engine, including the following information for each tune and/or tuner:
 - i. The date of each tune/tuner installation;
 - ii. The tune and/or tuner manufacturer, make, and model;
 - iii. The emissions control components that are affected (e.g. DPF, SCR, EGR, CGI, etc);
 - iv. All parties involved in providing, selling or installing the tune/tuner;
 - v. If the tune and/or tuner allows for any of the modifications described in Request 3, by, for example, enabling a modified vehicle, equipment, or engine to operate without displaying a MIL, prompting a DTC, and/or causing engine derating, identify each emission control system affected by the tune and/or tuner, and specify how the tune and/or tuner affects vehicle or engine operation; and
 - vi. If the tune and/or tuner alters engine operating parameters, such as fuel timing, fuel pressure, injection timing, fuel quantity, and/or injection pulse widths, specify which parameters the tune and/or tuner affects, or if not known, describe the anticipated gains from the tuner, such as increased horsepower, fuel economy, or torque.
12. Provide all documents, including invoices, purchase orders, receipts, and maintenance records related in any way to the following:
 - (a) Any modification to any emission control component, element of design, or emission related part identified in response to Request 11(a), above; and

- (b) Purchase, installation, and/or update of any and all tunes and/or tuners identified in response to Request 11(b) above.
13. Provide a copy of all documents (including but not limited to emails) that discusses or describes the alteration, blocking, bypassing, defeating, disconnecting, deleting, deactivating, removal (in part or in whole), or rendering inoperative in any way of any emission control component, element of design, and/or emission related part of any vehicle, equipment, or engine owned, operated or leased by you.

General:

14. Provide a detailed, written description of the business structures including ownership, corporate form, parent and/or subsidiary companies, and affiliated organizations, of Dykstra Machinery, LLC, Dykstra Management Company Inc., and Dykstra Inc.
15. Provide the location of all warehouses or storage facilities where Dykstra stores products.
16. Identify all persons consulted in preparing the answers to this Request for Information including his/her title(s), the request(s) to which each individual responded, and the period of time for which each individual is providing a response.
17. Information regarding all invoices Dykstra issued since January 1, 2017, as that information is kept in the normal course of business in your standard invoice management system (e.g., QuickBooks, Excel, etc.), including the invoices identified in response to Request Nos. 2 and 12.

Appendix D

Confidential Business Information

An entity may assert a business confidentiality claim covering all or part of the information provided in response to this Information Request for any business information entitled to confidential treatment under Section 208(c) of the CAA, 42 U.S.C. § 7542, and 40 C.F.R. Part 2, subpart B. Under Section 208(c) of the CAA, entities are entitled to confidential treatment of information that would divulge methods or processes entitled to protection as trade secrets. Under 40 C.F.R. Part 2, subpart B, business confidentiality means “the concept of trade secrecy and other related legal concepts which give (or may give) a business the right to preserve the confidentiality of business information and to limit its use or disclosure by others in order that the business may obtain or retain business advantages it derives from its rights in the information.” 40 C.F.R. § 2.201(e).

Information covered by a claim of business confidentiality will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in Section 208(c) of the CAA and 40 C.F.R. Part 2, subpart B. If no such business confidentiality claim accompanies the response to this Information Request when it is received by EPA, then such information may be made available to the public without further notice. *See* 40 C.F.R. § 2.204(a)(3).

Pursuant to 40 C.F.R. § 2.301(h), the EPA possesses the authority to disclose to any authorized representative of the United States information which might otherwise be entitled to confidential treatment. To assist in its review and analysis, the EPA may disclose information provided in response to this and other information requests to an EPA contractor, the Eastern Research Group, under contract number 68HERH19C0004. *See* 84 Fed. Reg. 8859, 59-60 (Mar. 12, 2019).

To assert a business confidentiality claim, an entity must place on (or attach to) all information subject to the claim either a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as “trade secret,” “proprietary,” or “company confidential” at the time it provides its response to this Information Request. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be provided separately to facilitate identification and handling by the EPA. An entity should indicate whether confidential treatment is only required until a certain date or until the occurrence of a certain event.

The criteria the EPA will use in determining whether material claimed as business confidential is entitled to confidential treatment are set forth at 40 C.F.R. §§ 2.208(a)-(d) and 2.301. Emission data, as defined at 40 C.F.R. § 2.301(a)(2), is expressly not entitled to confidential treatment under 40 C.F.R. Part 2, subpart B. *See* 42 U.S.C. § 7542(c); 40 C.F.R. § 2.301(e).

Appendix E

Statement of Certification

You are submitting the enclosed documents in response to the U.S. Environmental Protection Agency's ("EPA") Information Request, issued pursuant to Section 208(a) of the Clean Air Act, to determine compliance with the Clean Air Act and its affiliated regulations.

I certify that I am fully authorized by _____ [corporate affiliation] to provide the above information on its behalf to EPA.

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act, 42 U.S.C. § 7413(c)(2), and 18 U.S.C. §§ 1001 and 1341.

Date: _____

Name (Printed): _____

Signature: _____

Title: _____